

## REMARKS

### *Status of the claims*

In his April 8, 2005 Office Action, the Examiner rejected pending claims 16 – 19 and 21 based on obviousness.

Applicant has cancelled Claim 17, by incorporating this dependent claim into independent Claim 16. Applicant has amended the Claims 16, 18, and 19 and added new claims 25 and 26 to overcome the Examiner's objections and rejections.

### *Objections to the Drawings*

The Examiner objected to the drawings under 37 CFR 1.83(a) for failing to show every feature of the invention specified in the claims. Specifically, the "profile maintenance interface" (claims 16, 19) and "audit record" (claim 21) are not shown in the drawings.

The Applicant has amended Claims 16 and 19 by changing "profile management interface" to "purchaser interface." The purchaser interface is depicted in Figure 1 (Item 33). This interface is described at Page 18, Lines 8 – 16 of the specification:

"Turning now to Figure 11, the company purchasing agent is provided with a purchaser interface 33 through which he or she is able to maintain the local office profiles and/or or the list of authorized personnel titles 96. The purchasing agent is also provided with functionality enabling the expedited modification, deletion and/or approval of individual and service center orders 97 and can at any time view a report indicating the status of all orders in the system 98, from entry through shipment and billing. As shown n Figure 12, the company purchasing agent is the preferred level of control over the authorized titles list and the content of the service center profiles. The purchasing agent can add, edit or remove titles 99 and can create 100, modify 101 or remove 102 center profiles." Page 18, Lines 8 – 16.

Furthermore, it is clear from the disclosure that there may be more than one purchasing agent within a company. See Page 15, Line 18 – Page 16, Line 7:

"Although those of ordinary skill in the art will recognize that more or less levels may be enabled, Applicant has found it suitable for service of a broad range of company clients to implement a five level hierarchy of users. According to this hierarchy, the Gatekeeper is given full authority over a company's print ordering function, including the ability to generate reports and manage any subordinate function. For very large organizations, a Region Agent is given similar authority extending to locations assigned by the Gatekeeper. A Location Agent acts as an intermediary authority between the Gatekeeper or Region Agent and lower levels of authority. For large locations, a Department Agent may be implemented to be responsible for management of portions of a particular location as determined by the Location Agent. Finally, the individual user or Employee is

given responsibility over his or her own profile and allowed to enter orders as he or she may require. While those of ordinary skill in the art will recognize that the described system, which may be invoked in whole or in part depending upon a particular company client's needs, gives maximum flexibility for division of responsibility, it also produces a unique opportunity for the printer to implement various safeguards against erroneous or malicious orders.”

Therefore, this is ample basis for a system in which multiple purchasing agents can be given access to an interface for the purpose of modifying templates, user profiles, orders, and institution-indicative information.

Applicant is amending the drawings to conform to the written description of the “audit record.” Specifically, the Applicant is amending Figure 6 and adding Figure 21. This amendment to the drawings is not new matter. An amendment to an application is not new matter within the Patent Act or Rules of the Patent Office unless it discloses an invention, process, or apparatus not theretofore described. Triax Co. v. Hartman Metal Fabricators, Inc., 479 F.2d 951, 956 (2d Cir. 1973). If the latter submitted material simply completes or clarifies the prior disclosure it cannot be treated as new matter. Id. at 956-57. The term “audit record” is described in the written specification at Page 14, Lines 5-13. This amendment does not add new matter since it is only completing the prior disclosure by conforming the drawings to the written description. The drawings as amended only show what has already been described in the written specification.

The Applicant believes that these amendments overcome the Examiner’s objection to the drawings and respectfully asks that the objection be withdrawn and the amendments be accepted.

#### ***Claim Objections and Section 112 Rejections***

The Examiner rejected Claims 16-19 and 21 under 35 U.S.C. § 112, second paragraph and further objected to those claims based on grounds of ambiguity and lack of antecedent basis. Applicant has amended the claim language to correct these problems.

The Applicant would like to specifically point out that Claim 17 in its entirety and part of Claim 18 were incorporated into Claim 16. Claim 16 now incorporates the ability to determine if a user profile exists for a particular user. If the profile exists, the user may modify the profile. If the profile does not exist, the user may create a new profile. The most recent version of Claim 18, included both the ability for a user to create a new profile and the ability for a user to choose from a list of authorized titles. In its amended form Claim 18 now only contains the latter of these capabilities.

#### ***Section 103 Rejections***

Examiner rejected claims 16 through 19 under 35 U.S.C. § 103(a) as being unpatentable over Laverty et al (U.S. Patent No. 6,429,947). Examiner rejected claim 21 under 35 U.S.C. §

103(a) as being unpatentable over Laverty et al in view of Klatt et al. (U.S. Patent No. 6,473,760).

As stated in the Applicant's disclosure, a primary objective of this invention is to reduce the necessity for human interaction within the print product ordering process. U.S. Patent App. No. 09/825,734, Page 15, Line 5 – Page 16, Line 7. In order to further this goal, the Applicant presents a methodology that allows for the process of print order fulfillment to be decentralized to a great extent. The Applicant's methodology allows a user (defined as a member of the first group of institutional agents) to create an entirely new profile, over an Internet-accessible interface, without any approval from an institutional purchasing agent. The Laverty and Klatt references requires pre-authorization of users by way of establishing a user profile independently from the actual user. Laverty assigns this step to the product specialists as an initial set-up step. See Laverty Column 11, Lines 24 – 34. Klatt discloses that this initial population of data may be accomplished by interfacing the print ordering system to an existing ERP system. See Klatt Column 10, Line 55 – Column 11, Line 7. The Laverty methodology involves time-consuming manual entry and therefore adds expense on the front-end of the process and the Klatt methodology requires a high-level of expertise to ensure that the interfaces to the ERP system are properly defined, which also adds cost at the front end of the process.

Admittedly, a system that allows any user to create a user profile without approval and then allows any user to create print orders without approval invites malicious use of the system. However, the Applicant's methodology prevents this abuse in two manners. First, it provides audit records that show changes, modifications, and additions to user profiles and changes, modifications, and additions to print orders. U.S. Patent App. No. 09/825,734, Page 14, Lines 5-13. This capability provides a tracking mechanism for the purchasing agent (defined as a member of the second group of institutional agents). Secondly, the Applicant's methodology allows for mandatory or optional previewing of print orders by the purchasing agent. Page 19, Lines 6 – 23. This is counter-intuitive to the teachings of Laverty and Klatt in that it opens the possibility of human intervention on every print order. However, the Applicant's methodology further balances this ill-effect in two ways. First, the purchasing agent approval can be distributed across four levels, depending on the size and scope of the organization, thereby limiting the time required by the purchasing agent to approve print orders. See Page 15, Line 18 – Page 16, Line 2. Second, the Applicant's methodology allows for ordering limits which will trigger these controls. Page 16, Line 8 – Page 17, Line 2.

In summary, the Applicant's methodology is novel because it allows for the greatest level of division of responsibility in an automated print product ordering process while providing safeguards against malicious and erroneous use. Furthermore, the Applicant's methodology is non-obvious because it teaches away from the methodologies of the Laverty reference and the Klatt reference; that is, methodologies which concentrate the controls against malicious use at the front end of the process, in the customer set-up process step rather than at the back end of the process.

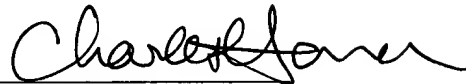
Appl. No. 09/825,734  
Amdt. dated June 30, 2005  
Reply to Office Action of April 8, 2005.

### CONCLUSION

Having addressed all matters raised by the Examiner's April 8, 2005, Office Action, Applicant respectfully requests that the claims be allowed.

Respectfully submitted,

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**Amendments to the Drawings:**

Figure 6 of the drawings is amended to show the steps of creating an audit record upon the creation or modification of the user profile. This step appears twice on the amended drawings and is labeled as item 83 in both instances. This depiction is consistent with the written description in the original specification at Page 13, Line 17 through Page 14, Line 13.

Applicant is adding Figure 21 as a drawing depicting the written description of the audit record. The audit record is disclosed in the original specification at Page 14, Lines 5 – 13.

Both Figure 6 and Figure 21 are included as attachments at the end of this document and are labeled as “REPLACEMENT SHEET” according to 37 CFR § 1.121(d).